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March 30, 2007

Honorable David R. Homer
United States Magistrate Judge
James T. Foley U.S. Courthouse
445 Broadway, Room 441
Albany, New York 12207

RE: ***Synca Direct, Inc. vs. MultiMedia Dental Systems, Inc.***
Index No.: 06-CV-1263

Dear Judge Homer:

I am requesting by this letter, that the Court consider this an application to revise, amend and update the Case Management Plan (CMP).

The Court previously entered the CMP dated February 28, 2007, and on this date we have filed an Amended Complaint which will bring in two (2) additional defendants who are located outside the United States, but whom I believe will consent to jurisdiction.

The Amended Complaint is dramatically different than that which was previously filed and will alter substantially the nature and scope of discovery in this case.

It is my belief that the new defendants who have been added to this case (Image Level and Michel Vannoye) will be filing counterclaims to set aside the copyright of MediaDent, the Defendant and Counterclaim Plaintiff, which as I noted above will substantially impact these proceedings.

We have not filed the Rule 26 Disclosure nor responded to Defendant's/Counter-Plaintiff's counsel's discovery demands due to the fact that we have not at this time executed a Confidentiality Stipulation. In light of the dramatic nature in which the litigation has changed, I am asking for a conference once the new Defendants appeal to discuss, amend and update the CMP and to allow time to await the new CMP before filing the Rule 26 Disclosure or responses to discovery.

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I would note that initially, at the Court's suggestion a settlement meeting was proposed by counsel for the Defendants/Counter-Plaintiffs and my client was initially interested, however, the new Defendants from whom my client obtained a license for the software and indemnification did not want to proceed in that manner.

If you have any questions or you believe a hearing is required, please so advise the undersigned.

Very truly yours,

STAFFORD, OWENS, CURTIN
& TROMBLEY, PLLC


By: William L. Owens, Esq.

WLO/ekh

cc: Gregory Digel, Esq.